



UNIVERSAL WASTE SMALL QUANTITY HANDLER (SQH) INSPECTION FORM

Facility's Name _____ Part 2 Rules

Date _____ ID# _____ 1994 PA 451

UNIVERSAL WASTE	QUANTITY (< 5000 kg or 11,000 lbs/year)

Examples: batteries, various pesticides, thermostats, mercury switches, mercury thermometers, waste devices containing only elemental Mercury, electric lamps (fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.

NI - Not Inspected

N/A - Not Applicable

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

YES NO

1. SQH disposed of universal waste? (Rule 228(4): 40 CFR (273.11(a))	UWR	[]	NI	N/A
2. SQH diluted or treated universal waste, except responding to releases or managing certain waste? (Rule 228(4): 40 CFR 273.11(b))	UWR	[]	NI	N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13)**Universal Waste Batteries:** (Rule 228(4): 273.13(a))

3. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks contained? (Rule 228(4): 40 CFR 273.13(a)(1))	UWR	[]	NI	N/A
4. If batteries are contained, are containers closed & structurally sound, compatible w/ contents of battery & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228 (4): 40 CFR 273.13(a)(1))	UWR	[]	NI	N/A
5. Are only the following activities allowed: sorted by type, mixed types in container, discharging to remove electric charge, regenerated, disassembled into individual batteries or cells, removed from consumer products or removed electrolyte, & castings of each battery not breached & remain intact & closed (except to remove electrolyte)? (Rule 228(4): 40 CFR 273.13(a)(2))	UWR	[]	NI	N/A
6. If electrolyte is removed or other wastes generated, is it determined whether it is hazardous waste? (Rule 228 (4): 40 CFR 273.13(a)(3))	UWR	[]	NI	N/A
a. If electrolyte or other waste is characteristic is it managed in compliance with Part 260-272? (Rule 228 (4): 40 CFR 273.13(a)(3)(i))	UWR	[]	NI	N/A
b. If electrolyte or other waste is not characteristic is it managed in compliance with Part 115 of 451? (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))	UWR	[]	NI	N/A
7. Are batteries or containers of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228 (4): 40 CFR 273.14(a))	UWR	[]	NI	N/A

Universal Waste Pesticides: (Rule 228(4): 273.13(b))

8. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ the pesticide? (Rule 228 (4): 40 CFR 273.13(b)(1))	UWR	[]	NI	N/A
9. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228 (2): 40 CFR 273.13(b)(2))	UWR	[]	NI	N/A
10. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met? (Rule 228 (2): 40 CFR 273.13(b)(3)) [USE TANK CHECKLIST]	UWR	[]	NI	N/A
11. If stored in transport vehicle, is it closed, structurally sound & compatible w/ pesticides? (Rule 228(a): 40 CFR 273.13(b)(4))	UWR	[]	NI	N/A
12. Are pesticides in container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDES" or "WASTE-PESTICIDES"? (Rule 228(2): 40 CFR 273.14(b)) [See 273.14(c) if 273.14(b) not possible]	UWR	[]	NI	N/A

Universal Waste Mercury Devices
(Thermostats, Mercury switch, Mercury thermometer, or a waste device which contains only elemental mercury):
 (Rule 228(4); 273.13(c))

		YES	NO
13. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks contained? (Rule 228(4): 40 CFR 273.13(c)(1))	UWR	[]	NI N/A
14. If mercury devices are contained, are containers closed, structurally sound, compatible w/ contents or thermostats & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR (273.13(c)(1))	UWR	[]	NI N/A
15. If ampules are removed:			
a. does facility try to prevent breakage & is removal done over containment device? (Rule 228(4): 40 CFR 273.13(c)(2)(i & ii))	UWR	[]	NI N/A
b. is clean-up system available to transfer spilled material to another container & used immediately? (273.13(c)(2)(iii & iv))	UWR	[]	NI N/A
c. is area well ventilated & monitored? (Rule 228 (4): 40 CFR 273.13(c)(2)(v))	UWR	[]	NI N/A
d. are employees familiar w/ proper waste handling & emergency procedures? (Rule 228(4): 40 CFR 273.13(c)(2)(vi))	UWR	[]	NI N/A
e. removed ampules stored in closed, non-leaking container? (Rule 228(4): 40 CFR 273.13(c)(2)(vii))	UWR	[]	NI N/A
f. removed ampules packed in container w/ packing material? (Rule 228 (4): 40 CFR 273.13(c)(2)(vii))	UWR	[]	NI N/A
16. If mercury or clean-up residues are generated is it determined whether it is hazardous waste? (Rule 228(4): 40 CFR 273.13(c)(3)(i)(A&B))	UWR	[]	NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272? (Rule 228(4): 40 CFR 273.13(c)(3)(ii))	UWR	[]	NI N/A
b. Of waste that isn't characteristic, is it managed in compliance with Part 115 and 121 of Act 541? (Rule 228(4): 40 CFR 273.13(c)(3)(iii))	UWR	[]	NI N/A
17. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE or WASTE or USED MERCURY (with type e.g., thermostat, switch, thermometer, device)(s)"? (Rule 228(4): 40 CFR 273.14(d))	UWR	[]	NI N/A

Universal Waste Electric Lamps: (Rule 228(4))

18. Are lamps crushed or broken? (electric lamps shall not be crushed or broken) (Rule 228(4)(c)(i))	UWR	[]	NI N/A
19. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible w/ contents of lamps & will prevent breakage? (Rule 228(4)(c)(ii))	UWR	[]	NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content ? (Rule 228(4)(c)(iii)(A))	UWR	[]	NI N/A
21. If lamp fragment or residues are generated is it determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B))	UWR	[]	NI N/A
a. If waste is characteristic is it managed in compliance w/ 40 CFR Part 260-272 & Part 111 of Act 451?	UWR	[]	NI N/A
b. If waste isn't characteristic is it managed in compliance w/ Part 115 of Act 451?	UWR	[]	NI N/A
22. Are lamps or packaging in which the lamps are contained labeled either "UNIVERSAL WASTE or WASTE or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv))	UWR	[]	NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

23. Accumulated less than one year? (Rule 228(4): 40 CFR 273.15(a)) OR (if no go to question 24)	UWR		NI N/A
24. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal (burden on handler to demonstrate)? (Rule 228(4): 40 CFR 273.15(b))	UWR	[]	NI N/A
25. Is the length of time universal wastes stored documented by one of the following:			
a. mark or label container with earliest date when universal waste became a waste? (Rule 228(4): 40 CFR 273.15(c)(1))	UWR	[]	NI N/A
b. mark or label individual items of universal waste w/ earliest date it became a waste? (Rule 228(4): 40 CFR 273.15(c)(2))	UWR	[]	NI N/A
c. maintain an inventory system on-site that identifies date an item became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(3))	UWR	[]	NI N/A
d. maintain an inventory system on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(4))	UWR	[]	NI N/A
e. placed universal waste in a specific accumulation area & identifying start date or date received? (Rule 228(4): 40 CFR 273.15(c)(5))	UWR	[]	NI N/A
f. other method with length of time universal waste accumulated and date it became a waste or received? (Rule 228(4): 40 CFR 273.15(c)(6))	UWR	[]	NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)**YES NO**

26. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	UWR	[]	NI	N/A
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RESPONSE TO RELEASE (RULE 228(4): 40 CFR 273.17)

27. Are releases of universal waste and other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	UWR	[]	NI	N/A
28. Is material from a release characterized? (Rule 228(4): 40 CFR 273.17(b))	UWR	[]	NI	N/A
29. If released material is hazardous waste is it managed as required under Parts 260 – 271? (Rule 228(4): 40 CFR 273.17(b))	UWR	[]	NI	N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

30. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4): 40 CFR 273.18(a))	UWR	[]	NI	N/A
31. If waste is a hazardous material are DOT requirements met w/ regard to package/labels/placards/shipping papers? (Rule 228(4): 40 CFR 273.18(c))	UWR	[]	NI	N/A
32. Prior to shipping universal waste off-site does receiver agree to receive shipment? (Rule 228(4): 40 CFR 273.18(d))	UWR	[]	NI	N/A
33. If the SQH self-transport waste does it comply w/ the universal waste transporter requirements? (Rule 228(4)(b): 40 CFR 273.18(b))	UWR	[]	NI	N/A
34. If universal waste shipped off-site is rejected by other handler or destination facility, does the originating handler either:				
a. receive the waste back? Rule 228(4): 40 CFR 273.18(e)(1))	UWR	[]	NI	N/A
b. agree to where shipment will be sent? (Rule 228(4): 40 CFR 273.18(e)(2))	UWR	[]	NI	N/A
35. If handler rejects part or full load from another handler, does the receiving handler contact the originating handler & discuss either:				
a. sending waste back to originating handler (Rule 228(4): 40 CFR 273.18(f)(1))	UWR	[]	NI	N/A
b. agree to where shipment will be sent? (Rule 228(4): 40 CFR 273.18(f)(2))	UWR	[]	NI	N/A
36. If handler receives shipment of hazardous waste that isn't universal waste, is MDEQ immediately notified? (Rule 228(4): 40 CFR 273.18(g))	UWR	[]	NI	N/A
37. If handler receives a shipment of non-hazardous, non-universal waste is the waste managed in accordance w/ solid waste regulations? (Rule 228(4): 40 CFR 273.18(h))	UWR	[]	NI	N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

38. Of waste that is sent to a foreign destination do they:				
a. comply w/ primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) and (b) and 262.57? (Rule 228(4): 40 CFR 273.20 (a))	UWR	[]	NI	N/A
b. export w/ consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, .262? (Rule 228(4): 40 CFR 273.20(b))	UWR	[]	NI	N/A
c. provide copy of Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20 (c))	UWR	[]	NI	N/A

COMMENTS:

EQP5186

(Rev 4/03) Page 3